

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DR. WILLIAM P. GRESS,)	
)	
Plaintiff,)	
)	
v.)	19 C 2444
)	
DOCTOR INVESTMENT GROUP, LLC)	Judge Norgle
and JOHN DOES 1-10,)	Magistrate Judge Gilbert
)	
Defendants.)	

PLAINTIFF’S MOTION FOR ENTRY OF DEFAULT JUDGMENT

Plaintiff, Dr. William P. Gress, respectfully requests that this Court enter default judgment in the amount of \$1,500.00 in statutory damages for the plaintiff, plus \$2,025.00 in attorney’s fees and \$485.00 in costs of suit against defendant Doctor Investment Group, LLC. In support thereof, Plaintiff states as follows:

1. On July 11, 2019, this Court entered an order granting plaintiff’s motion for entry of default. (*Dkt. No.* 9) Plaintiff now needs to prove up its damages and attorney’s fees and costs.
2. Plaintiff files the accompanying memorandum in support of his request for damages, attorney’s fees and costs.
3. In his memorandum, plaintiff respectfully requests an award of \$1,500.00 in statutory damages, \$2,025.00 in attorney’s fees and \$485.00 in costs of suit. Additionally, plaintiff requests that the Court enter an order enjoining defendant Doctor Investment Group, LLC from further transmitting unsolicited facsimile advertisements into the state of Illinois to plaintiff.

WHEREFORE, plaintiff respectfully requests entry of default judgment against defendant Doctor Investment Group, LLC, and in plaintiff's favor in the amount of \$1,500.00 in statutory damages, plus \$2,025.00 in attorney's fees and \$485.00 in costs of suit.

Respectfully submitted,

s/ Heather Kolbus
Heather Kolbus

Daniel A. Edelman
Heather Kolbus
EDELMAN, COMBS, LATTURNER & GOODWIN, LLC
20 S. Clark Street, Suite 1500
Chicago, Illinois 60603
(312) 739-4200

CERTIFICATE OF SERVICE

I, Heather Kolbus, hereby certify that on September 4, 2019, I caused a true and accurate copy of the foregoing document to be filed via the Court's CM/ECF system, and to be served via U.S. Mail on the following:

Doctor Investment Group, LLC
c/o Registered Agent, Eastbiz.com, Inc.
5348 Vegas Drive
Las Vegas, NV 89108

s/ Heather Kolbus
Heather Kolbus

Daniel A. Edelman
Heather Kolbus
EDELMAN, COMBS, LATTURNER & GOODWIN, LLC
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